

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 04-11578PBS

FIREMAN'S FUND INSURANCE
COMPANY
As Subrogee of Hodan Properties, Inc.

Plaintiff,

vs.

FIRE SYSTEMS, INC.,
FIRE SUPPRESSION SYSTEMS OF
NEW ENGLAND, INC.,
PRO CON, INC., and
BRIERE & PAQUETTE, INC. f/k/a
PAQUETTE ELECTRIC CO, INC.

Defendants

**DEFENDANT, FIRE SUPPRESSION SYSTEMS OF NEW
ENGLAND, INC.'S DISCLOSURE PER ORDER SETTING CASE FOR TRIAL**

Defendant, Fire Suppression Systems of New England, Inc. (hereinafter "FSS"), makes the following disclosure as required by above-referenced Order:

- 2(a).
1. All photographs taken by all experts.
All photographs taken by FSS employees following the loss.
Videotape taken by FSS after loss.
 2. All FSI documents regarding the inspection repair and maintenance of the Residence Inn, print off of alarm / trouble history of the panel, original disc for printout of data from panel.
 3. Weather reports for New Bedford, MA from September 2002 – January 20, 2003.
 4. All FSS records regarding installation, testing, certification for the fire suppression system at Residence Inn.
 5. All TEC records.

All Paquette Electric records.

6. All expert reports.

The above-referenced documents are all available for inspection at the offices of counsel for FSS.

- 2(b).
1. The former owner of the Residence Inn;
 2. All named defendants;
 3. Charles W. Barrett, FSI;
 4. Tom Klem;
 5. Dartmouth Fire Chief McNamara;
 6. John Palmer, FSI;
 7. Scott Mello, FSI;
 8. Scott Duplisea, TEC;
 9. David Bouchard of Fire Consulting Associates, Inc.;
 10. Christopher Paquin, Project Manager, FSS;
 11. William Roland, Marriott Residence Inn;
 12. Cory Rogers, former maintenance manager Residence Inn
 13. Richard R. Pepetti;
 14. Those individuals identified in Plaintiff's Automatic Disclosure;
 15. Tom O'Connor, FSS;
 16. Paul Bolermo, FSS;
 17. Charlie Higgins;
 18. Scott and Bill of TEC Control Systems, Inc.;
 19. Dave LaFlame, Paquette Electric;
 20. Jessie Madeiros of FSS;
 21. Clint of FSS; and

22. Kurt LaFlame, Paquette Electric.

2(c). None.

Defendant, FSS reserves the right to supplement these disclosures.

The defendant,

Fire Suppression Systems of
New England, Inc.
By its attorneys,

/s/ Jocelyn M. Sedney

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Dated: August 21, 2006